

Before the  
**COPYRIGHT ROYALTY JUDGES**  
The Library of Congress

<b>In the Matter of</b>	)	
	)	
<b>Distribution of the 2000-2003</b>	)	<b>Docket No. 2008-2</b>
<b>Cable Royalty Funds</b>	)	<b>CRB CD 2000-2003 (Phase II)</b>
	)	

**SETTLING DEVOTIONAL CLAIMANTS' RESPONSE TO ORDER TO SHOW CAUSE  
WHY RESTRICTED APPENDIX TO ORDER DIRECTING PARTIES TO REVIEW  
CALCULATIONS OF APPORTIONMENT OF ACCRUED INTEREST SHOULD NOT  
BE DISCLOSED TO MPA AND JSC**

The Settling Devotional Claimants ("SDC") are aware of no cause why the Restricted Appendix to the Judges' Order Directing Parties to Review Calculations of Apportionment of Accrued Interest should not be disclosed to MPA Represented Program Suppliers and the Joint Sports Claimants, particularly since they are already subject to the Judges' Protective Order of July 10, 2012.

The SDC's intent, however, was to request leave to serve the Restricted Appendix on all of the other Phase I parties who were parties to the Phase I settlement agreement for cable royalty years 2000-03, to give those parties the opportunity to decide for themselves whether to ask the Judges to keep the Restricted Appendix under seal. The reason for this request is that the Restricted Appendix may contain information that is derived directly or indirectly from the Phase I parties' confidential settlement agreement. Although the SDC do not seek to keep the Appendix confidential, others might, and they should be given the opportunity to be heard. The SDC cannot speak for other Phase I parties.

In addition to the SDC, the Phase I parties who were parties to the settlement agreement are MPA Represented Program Suppliers, Joint Sports Claimants, National Association of

Broadcasters, Public Television Claimants (represented by the Public Broadcasting Service), Music Claimants (Broadcast Music, Inc., American Society of Composers, Authors & Publishers, and SESAC, Inc.), National Public Radio, and the Office of the Commissioner of Baseball.

Furthermore, even though all claimant categories except for the Devotional claimants have received their final distributions as previously calculated, agreements the parties signed with the Library of Congress pursuant to 17 U.S.C. §801(b)(3)(C) and orders of the Judges directing partial distributions of funds require any party that has received more than its proper share to repay the difference, plus interest, to the Copyright Office. In light of the discrepancies that the SDC noted in the undistributed amounts remaining for cable royalty years 2000-2003 (as described in the SDC's Judges' Order Directing Parties to Review Calculations of Apportionment of Accrued Interest), and so that interested Phase I parties may confirm the accuracy of final distributions, the SDC request that all Phase I parties be given access to the Appendix and the Licensing Division's calculations.

May 8, 2020

Respectfully submitted,

**SETTLING DEVOTIONAL CLAIMANTS**

/s/ Matthew J. MacLean

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### **Certificate of Service**

I certify that on May 8, 2020, I caused a copy of the foregoing to be served on all parties registered to receive notice by eCRB by filing through the eCRB filing system.

/s/ Matthew J. MacLean  
Matthew J. MacLean

## Proof of Delivery

I hereby certify that on Friday, May 08, 2020, I provided a true and correct copy of the Response to Order to Show Cause Why Restricted Appendix to Order Directing Parties to Review Calculations of Apportionment of Accrued Interest Should Not Be Disclosed to MPA and JSC to the following:

Independent Producers Group (IPG), represented by Brian D Boydston, served via ESERVICE at brianb@ix.netcom.com

Signed: /s/ Matthew J MacLean